

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMES LIDESTRI,
Plaintiff,
-against-
AUDREY BURNS,
Defendant.

Case No.: 25-cv-1166

DANIEL S. SZALKIEWICZ declares as follows:

1. I am a partner at the law firm of Veridian Legal P.C., attorneys for defendant AUDREY BURNS (“Defendant”) in the above-captioned action. I submit this declaration in support of Defendant’s motion to dismiss.
2. Attached hereto as Exhibit 1 is a true and accurate copy of the New York Times Article entitled “She Was a Child Instagram Influencer. Her Fans Were Grown Men” and reproduced from the url: <https://www.nytimes.com/2024/11/10/us/child-influencer.html>.
3. Attached hereto as Exhibit 2 is a true and accurate copy of the New York Times Article entitled “The Men Who Use Instagram to Groom Child Influencers” and reproduced from the url: <https://www.nytimes.com/2024/12/30/us/child-influencers-photographers-abuse.html>.
4. Attached hereto as Exhibit 3 is a true and accurate copy of the Second Amended Complaint.
5. Attached hereto as Exhibit 4 is a true and accurate copy of a press release dated February 4, 2025.

6. Annexed hereto as Exhibit 5 is a true and accurate copy of a press release dated January 27, 2025.

7. The annexed memorandum of law complies with the word-count limitations.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: New York, New York

June 9, 2025

/s/Daniel Szalkiewicz, Esq.
Daniel S. Szalkiewicz